

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BARBARA STROUGO, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff(s),

v.

BARCLAYS PLC, BOB DIAMOND,
ANTONY JENKINS, CHRIS LUCAS and
TUSHAR MORZARIA,

Defendants.

Case No. 1:14-cv-05797-SAS

CLASS ACTION

DEMAND FOR JURY TRIAL

**JOINT STIPULATION AND [PROPOSED] ORDER SETTING
SCHEDULE FOR FILING OF AMENDED COMPLAINT
AND FOR BRIEFING OF ANTICIPATED MOTION TO DISMISS**

WHEREAS, on July 28, 2014, Plaintiffs filed their Complaint against Barclays PLC, Bob Diamond, Antony Jenkins, Chris Lucas, and Tushar Morzaria (collectively, "Defendants");

WHEREAS, on October 2, 2014, the Court appointed Mohit Sahni as Lead Plaintiff and Pomerantz LLP as Lead Counsel;

WHEREAS, on November 12, 2014, Defendants agreed to waive service of the Complaint, subject to Plaintiffs' agreement that Defendants preserve all available defenses (including lack of personal jurisdiction), except for the defense of insufficient service of process; and

WHEREAS, the Parties have met, conferred, and agreed to a schedule for filing an amended complaint and for the briefing of Defendants' anticipated motion to dismiss that complaint.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
Parties, through their undersigned counsel, as follows:

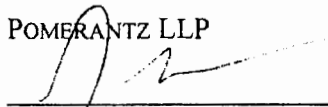
1. Lead Plaintiff shall file and serve the amended complaint no later than December 19,¹⁵
2014;
2. Defendants shall answer or otherwise respond to the amended complaint no later than
January 28, 2015;¹⁹
3. If Defendants move to dismiss the amended complaint, opposition papers shall be
served and filed no later than March 9, 2015;^{Feb 16}
4. Any reply papers shall be served and filed no later than April 8, 2015; and^{MAR 2}
5. Any hearing on the motion shall be conducted on _____, at _____ a.m., or at the Court's
earliest convenience.

The parties have agreed to reserve all other rights.

Dated: November 12, 2014
New York, New York

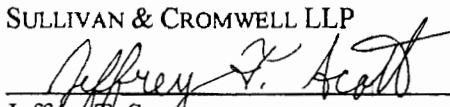
Respectfully submitted,

POMERANTZ LLP


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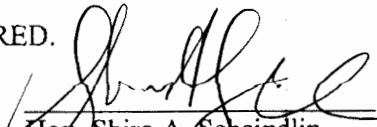
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Attorney for Defendants

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: Nov. 13, 2014


Hon. Shira A. Scheindlin
United States District Judge *em*